

REQUIRED STATEMENT
TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) WISAL A. HAJYASIN Case No. 17-04864 Chapter 13
A/K/A WISAL AL
HAYYASIN,

All Cases: Moving Creditor Select Portfolio Servicing, Inc., as servicer Date Case Filed 02/20/2017
for U.S. Bank, National Association, as Trustee for the EMC Mortgage
Loan Trust 2004-A, Mortgage Pass-through Certificates Series 2004-A

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe)

Chapter 13: Date of Confirmation Hearing 10/12/17 or Date Plan Confirmed 12/14/17

Chapter 7: ☐ No-Asset Report Filed on
☐ No-Asset Report not Filed, Date of Creditors Meeting

1. Collateral
 - a. ☒ Home
 - b. ☐ Car Year, Make and Model _____
 - c. ☐ Other (describe) _____
2. Balance Owed as of Petition Date \$57,002.08 per Claim 7-2
Total of all other Liens against Collateral \$15,000.00
3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in all cases) \$ 135,000.00 per Debtor's Schedules A & D
5. Default
 - a. ☐ Pre-Petition Default
Number of months NA Amount \$ _____
 - b. ☒ Post-Petition Default as of 12/4/18
 - i. ☒ On direct payments to the moving creditor
Number of months 9 Amount \$ 6024.57
 - ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount \$ _____
6. Other Allegations
 - a. ☐ Lack of Adequate Protection § 362 (d)(1)
 - i. ☐ No insurance
 - ii. ☐ Taxes unpaid Amount \$ _____
 - iii. ☐ Rapidly depreciating asset
 - iv. ☐ Other (describe) _____
 - b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. ☐ Other "Cause" § 362 (d)(1)
 - i. ☐ Bad Faith
 - ii. ☐ Multiple filings
 - iii. ☐ Other (describe)
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. ☐ Reaffirm
 - ii. ☐ Redeem
 - iii. ☐ Surrender
 - iv. ☐ No Statement of Intention filed

Date: 12/19/18

/s/ Timothy R. Yuell
Submitted By